

1 Elizabeth Green (admitted *pro hac vice* per Dkt. 853)
2 **BAKER & HOSTETLER LLP**
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8 Attorneys for Debtor
9 **SOUTHERN INYO HEALTHCARE DISTRICT**

10 **UNITED STATES BANKRUPTCY COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12 **FRESNO DIVISION**

13 In re

14 Case No.: 16-10015

15 SOUTHERN INYO HEALTHCARE
16 DISTRICT,

17 Chapter 9

18 Debtor.

19 **DECLARATION OF ELIZABETH
20 GREEN IN SUPPORT OF REQUEST
21 FOR DETERMINATION OF
22 REASONABLENESS OF
23 PROFESSIONAL FEES OF BAKER &
24 HOSTETLER LLP**

25 **Hearing Date, Time, and Location**

26 Date: May 20, 2020
27 Time: 1:30 p.m.
28 Dept: A
29 Ctrm: 11 (Fresno)

30 1. I am more than 18 years of age and of sound mind.

31 2. I am a Partner with Baker & Hostetler LLP (“Baker”) counsel to the Southern Inyo
32 Healthcare District, the Debtor in the above-captioned bankruptcy case (the “Debtor”). I know the
33 facts herein stated of my own personal knowledge and if called upon to do so, I could competently
34 testify to them under oath. I submit this declaration in support of Baker’s Request for Determination
35 of Reasonableness of Professional Fees, filed concurrently.

1 3. Baker is a national law firm with expertise in bankruptcy law and extensive
2 experience in health care bankruptcies.

3 4. The rates Baker charged for its professional services in this case were its customary
4 rates and similar to those Baker charged for professional services in comparable bankruptcy and
5 non-bankruptcy cases in California.

6 5. Baker worked approximately 2,300 hours on this bankruptcy. As a result of that
7 work, the Debtor incurred fees and expenses owed to Baker in the amounts of \$1,081,104.50 and
8 \$125,098.54 respectively. Baker has agreed to treatment and payment as set forth in the Seventh
9 Amended Plan of Adjustment (Dkt. 915, p. 12).

10 I declare under penalty of perjury under the laws of the United States that the foregoing is
11 true and correct.

12
13 Dated: April 24, 2020

14 _____
15 /s/ *Elizabeth Green*
16 Partner, Baker & Hostetler LLP
17 Executed in Orlando, Florida